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*\*The Constitutional Law Center for Muslims in America*  
*is the legal division of the Muslim Legal Fund of America.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

COREY GERWASKI,

Plaintiff,

v.

STATE OF NEVADA, ex rel. BOARD  
OF REGENTS of the NEVADA  
SYSTEM OF HIGHER EDUCATION,  
on behalf of the UNIVERSITY OF  
NEVADA, LAS VEGAS; KEITH  
WHITFIELD, individually; AJP  
EDUCATIONAL FOUNDATION INC.,  
a California Non-Profit Corporation;  
STUDENTS FOR JUSTICE OF  
PALESTINE-UNLV; NATIONAL  
STUDENTS FOR JUSTICE OF  
PALESTINE; NEVADANS FOR  
PALESTINIAN LIBERATION;  
DOES I-XX and ROE entities I-XX,

Defendants.

Case No. 2:24-cv-00985- APG-MDC

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE  
SPECIAL MOTION TO DISMISS  
PURSUANT TO NRS 41.660**

1  
2 IT IS HEREBY STIPULATED between Plaintiff COREY GERWASKI, and  
3 Defendant AJP EDUCATIONAL FOUNDATION, INC. (“AMP”), by and through their  
4 respective counsel, the following:

- 5 1. Under Nevada’s anti-SLAPP statute, a special anti-SLAPP motion to dismiss must  
6 ordinarily be filed “within 60 days after service of the complaint, which period may  
7 be extended by the court for good cause shown.” NRS 41.660(2).
- 8 2. Additionally, the court “shall modify any deadlines pursuant to this section or any  
9 other deadlines relating to a complaint filed pursuant to this section if such  
10 modification would serve the interests of justice.” NRS 41.660(6).
- 11 3. Plaintiff served his Summons and First Amended Complaint on Defendant AMP  
12 on September 3, 2024. (ECF No. 10.)
- 13 4. The current deadline to file an anti-SLAPP motion to dismiss is November 4, 2024.
- 14 5. Good cause exists to extend this period due to Defendant’s attorneys conflicting  
15 schedules, including the following:
  - 16 a. Ms. McLetchie and Mr. Wolpert have had several competing deadlines,  
17 including multiple briefs before the Nevada Supreme Court and the  
18 Ninth Circuit Court of Appeals;
  - 19 b. Ms. McLetchie and Mr. Wolpert also have upcoming briefing deadlines  
20 in two matters before the Nevada Supreme Court and one matter before  
21 the Ninth Circuit Court of Appeals;
  - 22 c. Additionally, Ms. McLetchie has oral argument scheduled before the  
23 Nevada Supreme Court on November 7, 2024;

- d. Prior to the instant deadline, Ms. McLetchie has been devoting substantial time and attention to handling her recently-deceased mother's affairs and estate;
  - e. Additional AMP briefing due and hearings occurring in other litigation cases currently pending in the Northern District of Illinois, Eastern District of Virginia and Virginia court of appeals in the intervening time, handled by the same two attorneys representing AMP *pro hac vice* in this matter;
  - f. The filing of a Petition to the United States Supreme Court in another matter by AMP's *pro hac vice* attorneys, later in September 2024;
  - g. Filings in two D.C. Circuit Court of Appeals cases handled by AMP's *pro hac vice* attorneys, in September and October 2024; and
  - h. Three Title VI complaints filed with the Department of Education's Office of Civil Rights on behalf of groups of students and faculty, against Rice University, University of Texas-Dallas, and University of California-Irvine, filed in October and led by AMP's lead *pro hac vice* attorney.
6. In addition, an unexpected and urgent medical event occurred involving the senior citizen parent of AMP's lead *pro hac vice* attorney, for whom counsel is the primary caregiver, which began September 4, 2024 and necessitated an ambulance ride and hospital stay, then required twelve (12) intervening medical appointments to date that required AMP's lead *pro hac vice* attorney's presence.
7. Plaintiff's counsel does not oppose this Request.

8. As this case remains in its early stages, this short extension will not create undue delay or burden any parties or the Court. Indeed, the parties have also stipulated to a 30-day extension to submit a stipulated discovery plan. (ECF No. 31.)

Dated this 4th day of November, 2024.

Dated this 4th day of November, 2024.

/s/ Margaret A. McLetchie

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*Local Counsel for Defendant*

*AJP Educational Foundation, Inc.*

**ORDER**

IT IS THEREFORE ORDERED that Defendant AMP shall have up and until November 18, 2024, to file a special motion to dismiss pursuant to NRS 41.660.

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE